Inland Empire Waterkeeper
Advocacy • Education • Restoration • Enforcement

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October 24, 2014

VIA CERTIFIED MAIL

Firth Rixson, Inc.
Attention: Managing Agent
10685 Beech Avenue
Fontana, California 92337

VIA U.S MAIL

National Corporate Research, Ltd.
Registered Agent for Firth Rixson, Inc.
615 S Dupont Hwy
Dover, Delaware 19901

Re: Notice of Violation and Intent to File Suit Under the Clean Water Act

To Whom It May Concern:

I am writing on behalf of Inland Empire Waterkeeper and Orange County Coastkeeper (collectively "Waterkeeper") in regard to violations of the Clean Water Act[1] and California's Storm Water Permit[2] occurring at 10685 Beech Avenue, Fontana, California 92337 ("Forged Metals Facility" or "Facility"). This letter is being sent to you as the responsible owner and/or operator of the Forged Metals Facility, or as the registered agent for this entity. This letter puts Firth Rixson, Inc. (hereinafter referred to as the "Forged Metals Facility Owner and/or Operator") on notice of the violations of the Storm Water Permit occurring at the Forged Metals Facility including, but not limited to, discharges of polluted storm water from the Forged Metals Facility into local surface waters. Violations of the Storm Water Permit are violations of the Clean Water Act. As explained below, the Forged Metals Facility Owner and/or Operator is liable for violations of the Storm Water Permit and the Clean Water Act.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that a citizen give notice of his/her intention to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a). Notice must be given to the alleged violator, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator of the EPA, the Executive Officer of the water pollution control agency

[1] Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.*
[2] National Pollution Discharge Elimination System ("NPDES") General Permit No. CAS000001 [State Water Resources Control Board] Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ.

B. The Owner and/or Operator of the Forged Metals Facility

Information available to Waterkeeper indicates that Firth Rixson, Inc. is an owner and/or operator of the Forged Metals Facility. Firth Rixson, Inc. is an active corporation registered in Delaware, and owns Forged Metals, Inc. (an active corporation registered in California). Information available to Waterkeeper indicates that Firth Rixson, Inc. is doing business in and has contacts with California via operations and industrial activities at the Forged Metals Facility. The registered agent for Firth Rixson, Inc. is National Corporate Research, Ltd. located at 615 S Dupont Hwy Dover, Delaware 19901.

The Forged Metals Facility Owner and/or Operator has violated and continues to violate the procedural and substantive terms of the Storm Water Permit including, but not limited to, the illegal discharge of pollutants from the Forged Metals Facility into local surface waters. As explained herein, the Forged Metals Facility Owner and/or Operator is liable for violations of the Storm Water Permit and the Clean Water Act.

C. The Forged Metals Facility's Storm Water Permit Coverage

Prior to beginning industrial operations, dischargers are required to apply for coverage under the Storm Water Permit by submitting a Notice of Intent to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity ("NOI") to the State Water Resources Control Board ("State Board"). *See* Storm Water Permit, Finding #3. On May 26, 1992, Forged Metals, Inc. submitted an NOI for the Forged Metals Facility ("1992 NOI"). The NOI indicated that the Facility is approximately six (6) acres in size. On February 24, 1998, Forged Metals, Inc. submitted a Notice of Intent for Existing Facility Operators, as required by the State Board ("1998 NOI"). A third NOI, dated June 23, 2010 ("2010 NOI"), is also on file with the State Board for the Forged Metals Facility and lists the size of the Facility as eight (8) acres. The 1992 NOI, 1998 NOI, and 2010 NOI list the Waste Discharge Identification ("WDID") number for the Forged Metals Facility as 8-36I007116.

The 1992 NOI, 1998 NOI, and 2010 NOI list the Standard Industrial Classification ("SIC") code for the Forged Metals Facility as 3462 (Iron and Steel Forgings). Facilities classified as SIC code 3462 are covered by the Storm Water Permit in areas where industrial materials, equipment, or activities are exposed to storm water. *See* Storm Water Permit, Attachment 1. Information available to Waterkeeper indicates that industrial activities are exposed to storm water at the Forged Metals Facility, such as unloading of raw materials and loading of finishing products. Additionally, unprocessed materials, equipment, and scrap materials are stored outdoors in areas exposed to storm water. The Storm Water Permit regulates the areas where these activities and equipment are exposed to storm water at the Forged Metals Facility.

Information available to Waterkeeper indicates that SIC code 3398 (Metal Heat Treating) also applies to the Forged Metals Facility. The Facility's Storm Water Pollution Prevention Plan ("SWPPP") and site map specifically identify and describe a "heat treatment area" located in the northeastern portion of the Facility where metals are annealed and/or hardened, and thus this SIC code applies to the Facility. When a manufacturing facility is classified under SIC code 3398, the

contact Water Recreation; Warm Freshwater Habitat; Wildlife Habitat; and Rare, Threatened, or Endangered Species. *See* Basin Plan at Table 3-1. According to the 2010 303(d) List of Impaired Water Bodies, Reach 4 of the Santa Ana River is impaired for pathogens, Reach 3 is impaired for copper, lead, and pathogens, and Reach 2 is impaired for indicator bacteria.[4] Polluted discharges from industrial sites such as the Forged Metals Facility contribute to the degradation of these already impaired surface waters and of the ecosystems that depend on these waters.

II. THE FORGED METALS FACILITY AND ASSOCIATED DISCHARGES OF POLLUTANTS

A. The Forged Metals Facility Site Description

Information available to Waterkeeper indicates that the Forged Metals Facility is approximately eight (8) acres and 20% impervious. The Facility property is bordered by Beech Avenue to the west, between Slover Avenue and Manila Street. The points of egress/ingress to the Facility include three (3) driveways leading to Beech Avenue, including one in the southwest corner of the property, one in the middle of the property at the west end of the central parking lot, and one in the northwest corner of the property at the end of the north parking lot.

Information available to Waterkeeper indicates that the Facility includes a shipping and receiving area in the northeast corner of the Facility at the end of the north parking lot that is used to unload raw materials and load finished products before shipping. Just east of the shipping and receiving area is the heat treatment area, which includes several furnaces and large baths, plus an open-air cooling water system. The Facility also includes a machine shop building that is located towards the center of the Facility and south of the center parking lot. Metal products are manufactured, honed, and customized in this building. Metal scraps and pieces are also stored in this building before they are disposed or recycled. Just south of the machine shop building is the grinding area, which includes several enclosed areas for maintaining tools and parts. On the south end of the Facility is the forging area, which is an enclosed area where equipment is stored and most of the metal processing occurs, including the use of furnaces, hammers, open and closed die casting, and extrusion equipment. Cooling water is also brought into this area for the cooling of forging equipment. Steam cleaning occurs along the north wall of the forging area. Finally, the wastewater treatment area is located just west of the steam cleaning area and processes all of the cooling water in the Facility, particularly from the heat treatment area and forging area.

B. The Forged Metals Facility Industrial Activities and Associated Pollutants

According to information available to Waterkeeper, the Forged Metals Facility manufactures rings for the aerospace industry and produces customized forgings for numerous other products, such as prosthetic surgery, land-based gas turbines, and diesel engines. The

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[4] 2010 Integrated Report – All Assessed Waters, available at: http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml (last accessed on April 8, 2014).

See 33 U.S.C. §§ 1311(a), 1342; 40 C.F.R. § 122.26(c)(1); *see also* Storm Water Permit, Fact Sheet at VII.

A. Discharges of Polluted Storm Water from the Forged Metals Facility in Violation of Effluent Limitation B(3) of the Storm Water Permit

Effluent Limitation B(3) of the Storm Water Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of best management practices ("BMPs") that achieve best available technology economically achievable ("BAT") for toxic pollutants[5] and best conventional pollutant control technology ("BCT") for conventional pollutants.[6] Benchmark Levels are relevant and objective standards to evaluate whether a permittee's BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the Storm Water Permit.[7]

Storm water sampling at the Forged Metals Facility demonstrates that the Facility's storm water discharges contain concentrations of pollutants above the Benchmark Levels. *See* Exhibit A (table listing the Facility's storm water samples exceeding Benchmark Level(s), as reported to the Regional Board by the Forged Metals Facility Owner and/or Operator and in samples collected by Waterkeeper). The repeated and significant exceedances of Benchmark Levels demonstrate that the Forged Metals Facility Owner and/or Operator has failed and continues to fail to develop and/or implement BMPs to prevent the exposure of pollutants to storm water and to prevent discharges of polluted storm water from the Forged Metals Facility, in violation of Effluent Limitation B(3) of the Storm Water Permit.

Information available to Waterkeeper indicates that the Forged Metals Facility Owner and/or Operator violates Effluent Limitation B(3) of the Storm Water Permit for failing to develop and/or implement BMPs that achieve BAT/BCT each time storm water is discharged from the Forged Metals Facility. *See e.g.*, Exhibit C (setting forth dates of rain events resulting in a discharge at the Facility).[8] These discharge violations are ongoing and will continue each day the Forged Metals Facility Owner and/or Operator discharges polluted storm water without developing and/or implementing BMPs that achieve compliance with the BAT/BCT standards. Waterkeeper will update the number and dates of violation when additional information and data becomes available. Each time the Forged Metals Facility Owner and/or Operator discharges polluted storm water in violation of Effluent Limitation B(3) of the Storm Water Permit is a

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[5] Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

[6] Conventional pollutants are listed at 40 C.F.R. § 401.16 and include biological oxygen demand, total suspended solids, oil and grease, pH, and fecal coliform.

[7] *See* EPA Storm Water Multi-Sector Permit (2008), Fact Sheet, p. 106; *see also*, EPA Storm Water Multi-Sector Permit, 65 Federal Register 64839 (2000).

[8] Exhibit C sets forth dates of significant rain events as measured at the San Bernardino County Yard rain gauge from May 1, 2009 to May 1, 2014. A significant rain event is defined by EPA as a rainfall event generating 0.1 inches or more of rainfall, which generally results in measurable discharges at a typical industrial facility.

Information available to Waterkeeper indicates that the storm water discharges from the Forged Metals Facility violate Receiving Water Limitations C(1) and/or C(2) each time storm water is discharged from the Facility. These violations are ongoing, and will continue each time contaminated storm water is discharged in violation of Receiving Water Limitation C(1) and/or C(2) of the Storm Water Permit. Each time discharges of storm water from the Facility adversely impact human health or the environment is a separate and distinct violation of Receiving Water Limitation C(1) of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). Each time discharges of storm water from the Forged Metals Facility cause or contribute to an exceedance of an applicable WQS is a separate and distinct violation of Receiving Water Limitation C(2) of the Storm Water Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). Waterkeeper will update the number and dates of violations when additional information becomes available. The Forged Metals Facility Owner and/or Operator is subject to civil penalties for all violations of the Clean Water Act occurring since October 24, 2009.

C. Non-Storm Water Discharges from the Forged Metals Facility in Violation of Discharge Prohibition A(1) of the Storm Water Permit

Except as authorized by Special Conditions D(1) of the Storm Water Permit, Discharge Prohibition A(1) prohibits permittees from discharging materials other than storm water (non-storm water discharges) either directly or indirectly to waters of the United States. Prohibited non-storm water discharges must be either eliminated or permitted by a separate NPDES permit. *See* Storm Water Permit, Discharge Prohibition A(1).

Information available to Waterkeeper indicates that unauthorized non-storm water discharges occur at the Facility due to inadequate BMP development and/or implementation necessary to prevent these discharges. For example, the Forged Metals Facility's SWPPP states that a cooling water system is used inside of the heat treatment area and this system may leak onto the asphalt outside. The SWPPP does not identify these leaks as non-storm water discharges, nor does it include BMPs to address the leaks or to prevent these non-storm water discharges. Additionally, the SWPPP does not identify what pollutants would be in leaking cooling water, but only refers to the "things" in the cooling water "that might contaminate storm water." Cooling water is also used in the Facility's industrial activities, and is a potential source of non-storm water discharges in the heat treatment and forging areas. Further, the SWPPP states that the Facility's cooling water gets processed in the waste water treatment area and then is "drained." However, this drained water is not identified as a non-storm water discharge and there are no BMPs to prevent non-storm water discharges from the Facility. Non-storm water discharges resulting from cooling water system leaks and waste water treatment draining are not from sources that are listed among the authorized non-storm water discharges in Special Conditions D(1) of the Storm Water Permit and thus are always prohibited under the Storm Water Permit.

Waterkeeper puts the Forged Metals Facility Owner and/or Operator on notice that Discharge Prohibition A(1) of the Storm Water Permit is violated each time non-storm water is discharged from the Forged Metals Facility. These discharge violations are ongoing and will continue until the Forged Metals Facility Owner and/or Operator develops and implements

all impervious areas of the Facility, locations where materials are directly exposed to precipitation, or all areas of industrial activity.

Additionally, the Facility SWPPP does not identify the names of the pollution prevention team members or the significant materials handled and stored at the Facility to the extent required by the Storm Water Permit. Further, the Storm Water Permit requires the SWPPP to describe the types of pollutants that could be discharged in a facility's storm water discharges. However, the SWPPP only uses general words such as "things," "chemicals," "metals," and "various lubricants" to describe pollutants associated with industrial activities at the Facility, rather than identifying what pollutants are associated with, for example, cooling water system leaks, as required by the Storm Water Permit. Such specificity is required to develop adequate BMPs to reduce the different pollutants from the Facility's discharges. Although the SWPPP makes multiple references to worksheets that may include additional information required by the Storm Water Permit, these worksheets were not included in the current SWPPP that the Forged Metals Facility Owner and/or Operator provided to the Regional Board. Further, even when more specific pollutants are identified, the SWPPP still does not include all of the information required by the Storm Water Permit about these pollutants, such as the characteristics or quantity of the significant materials.

Additional examples of the Forged Metals Facility Owner's and/or Operator's failure to develop and/or implement a SWPPP that complies with the Storm Water Permit include the lack of any description of dust and particulate pollutants generated by the Facility's industrial activities, the Facility's non-storm water discharges, or areas of soil erosion. The SWPPP also does not include a summary of all areas of industrial activities and the potential pollutants in a table resembling Table B in the Storm Water Permit, as required by Section A(6)(b) of the Storm Water Permit. Further, the descriptions of the BMPs in the SWPPP do not comply with the Storm Water Permit requirements.

The Forged Metals Facility Owner and/or Operator has also failed to revise the Facility's SWPPP to ensure compliance with the Storm Water Permit. Despite the significant concentrations of pollutants in the Facility's storm water discharges every year since at least the 2008-2009 Wet Season,[10] the Facility's current SWPPP is dated October 11, 2007, and therefore was never revised to include additional BMPs to eliminate or reduce these pollutants, as required by the Storm Water Permit. Further, in the Facility's 2008-2009 Annual Report the Forged Metals Facility Owner and/or Operator described changes to the Facility's training program to improve storm water monitoring at the Facility, yet the current SWPPP pre-dates these proposed changes and was not revised as required to include these changes.

The Forged Metals Facility Owner and/or Operator has failed to adequately develop, implement, and/or revise a SWPPP, in violation of Section A and Provision E(2) of the Storm Water Permit. Every day the Forged Metals Facility operates with an inadequately developed, implemented, and/or properly revised SWPPP is a separate and distinct violation of the Storm Water Permit and the Clean Water Act. The Forged Metals Facility Owner and/or Operator has

[10] The Storm Water Permit defines the Wet Season as October 1 – May 30.

areas are substantially identical." If a discharger seeks to reduce sampling locations, the "[f]acility operators must document such a determination in the annual report." *Id.*

The Forged Metals Facility Owner and/or Operator has been conducting operations at the Forged Metals Facility with an inadequately developed, implemented, and/or revised M&RP. For example, the Forged Metals Facility Owner and/or Operator has failed and continues to fail to conduct all required quarterly visual observations of unauthorized discharges, in violation of Section B(3) of the Storm Water Permit. Additionally, the Forged Metals Facility Owner and/or Operator has failed to provide the records required by Section B(4) of the Storm Water Permit for the monthly visual observations of storm water discharges.

The Forged Metals Facility Owner and/or Operator also failed to collect and analyze storm water samples as required by the Storm Water Permit. For example, only one storm water sample was collected during the 2009-2010 Wet Season, rather than the two storm water samples required by Section B(5) of the Storm Water Permit, despite qualifying rain events. Further, the Forged Metals Facility Owner and/or Operator failed to collect any storm water samples during the 2008-2009 and 2012-2013 Wet Seasons even though qualifying storm events occurred, in violation of Section B(5) of the Storm Water Permit. *See* Exhibit C. Also, samples collected by Waterkeeper show that copper is present in storm water samples from the Facility in concentrations well above the Benchmark Levels, and thus copper is present in the Facility's storm water discharges in significant quantities. As a result, the Forged Metals Facility Owner and/or Operator is required to analyze its storm water samples from the Facility for this pollutant under Section B(5)(c)(ii) of the Storm Water Permit. However, the Forged Metals Facility Owner and/or Operator has never analyzed any storm water samples for copper.

The Forged Metals Facility Owner's and/or Operator's failure to conduct sampling and monitoring as required by the Storm Water Permit demonstrates that it has failed to develop, implement, and/or revise an M&RP that complies with the requirements of Section B and Provision E(3) of the Storm Water Permit. Every day that the Forged Metals Facility Owner and/or Operator conducts operations in violation of the specific monitoring requirements of the Storm Water Permit, or with an inadequately developed and/or implemented M&RP, is a separate and distinct violation of the Storm Water Permit and the Clean Water Act. The Forged Metals Facility Owner and/or Operator has been in daily and continuous violation of the Storm Water Permit's M&RP requirements every day since at least October 24, 2009. These violations are ongoing, and Waterkeeper will include additional violations when information becomes available. The Forged Metals Facility Owner and/or Operator is subject to civil penalties for all violations of the Clean Water Act occurring since October 24, 2009.

F. <u>Failure to Comply with the Storm Water Permit's Reporting Requirements</u>

Section B(14) of the Storm Water Permit requires a permittee to submit an Annual Report to the Regional Board by July 1 of each year. Section B(14) requires that the Annual Report include a summary of visual observations and sampling results, an evaluation of the visual observation and sampling results, the laboratory reports of sample analysis, the annual comprehensive site compliance evaluation report, an explanation of why a permittee did not implement any activities required, and other information specified in Section B(13).

IV. RELIEF AND PENALTIES SOUGHT FOR VIOLATIONS OF THE CLEAN WATER ACT

Pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. § 19.4, each separate violation of the Clean Water Act subjects the violator to a penalty for all violations occurring during the period commencing five (5) years prior to the date of a notice of intent to file suit letter. These provisions of law authorize civil penalties of up to $37,500 per day per violation for all Clean Water Act violations on and after January 12, 2009. In addition to civil penalties, Waterkeeper will seek injunctive relief preventing further violations of the Clean Water Act pursuant to Sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), declaratory relief, and such other relief as permitted by law. Lastly, pursuant to Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), Waterkeeper will seek to recover its costs, including attorneys' and experts' fees, associated with this enforcement action.

V. CONCLUSION

Waterkeeper is willing to discuss effective remedies for the violations described in this Supplemental Notice Letter. However, upon expiration of the 60-day notice period, Waterkeeper will file a citizen suit under Section 505(a) of the Clean Water Act for Union Pacific's violations of the Storm Water Permit. Please direct all communications to Waterkeeper's legal counsel:

Daniel Cooper
daniel@lawyersforcleanwater.com
Caroline Koch
caroline@lawyersforcelanwater.com
Lawyers for Clean Water, Inc.
1004-A O'Reilly Avenue
San Francisco, California 94129
Tel: (415) 440-6520

Sincerely,

Garry Brown

Garry Brown
Executive Director
Orange County Coastkeeper
Inland Empire Waterkeeper

Exhibit A

Exhibit B

Sample collected by Waterkeeper (W) or Discharger (D)	Date of sample collection	Sample Location	Parameter	Result	Units	Benchmark	Magnitude of Benchmark Exceedance	California Toxics Rule Criteria	Magnitude of CTR Exceedance
D	11/4/11	Drain #2 South	Aluminum	1.6	mg/L	0.75	2.133333333	none	N/A
D	11/4/11	Drain #2 South	Total Suspended Solids	55	mg/L	100	0	none	N/A
D	11/4/11	Drain #2 South	pH	7.38	s.u.	6.0-9.0	N/A	6.5-8.5	N/A
D	11/4/11	Drain #2 South	Specific Conductance	170	umohs/cm	200	0	none	N/A
D	11/4/11	Drain #2 South	Oil & Grease	5.9	mg/L	15	0	none	N/A
D	2/15/12	Drain #1 North	Chemical Oxygen Demand	180	mg/L	110	1.636363636	none	N/A
D	2/15/12	Drain #1 North	Zinc	0.3	mg/L	0.11	2.727272727	0.12	2.5
D	2/15/12	Drain #1 North	N+N	4	mg/L	0.068	58.82352941	none	N/A
D	2/15/12	Drain #1 North	Iron	2.4	mg/L	1	2.4	none	N/A
D	2/15/12	Drain #1 North	Aluminum	1.7	mg/L	0.75	2.266666667	none	N/A
D	2/15/12	Drain #1 North	Specific Conductance	190	umohs/cm	200	0	none	N/A
D	2/15/12	Drain #1 North	Total Suspended Solids	66	mg/L	100	0	none	N/A
D	2/15/12	Drain #1 North	pH	7.27	s.u.	6.0-9.0	N/A	6.5-8.5	N/A
D	2/15/12	Drain #2 South	Specific Conductance	280	umohs/cm	200	1.4	none	N/A
D	2/15/12	Drain #2 South	Oil & Grease	26	mg/L	15	1.733333333	none	N/A
D	2/15/12	Drain #2 South	Chemical Oxygen Demand	330	mg/L	110	3	none	N/A
D	2/15/12	Drain #2 South	Zinc	0.23	mg/L	0.11	2.090909091	0.12	1.9
D	2/15/12	Drain #2 South	N+N	0.63	mg/L	0.068	9.264705882	none	N/A
D	2/15/12	Drain #2 South	Iron	3.6	mg/L	1	3.6	none	N/A
D	2/15/12	Drain #2 South	Aluminum	1.8	mg/L	0.75	2.4	none	N/A
D	2/15/12	Drain #2 South	Total Suspended Solids	82	mg/L	100	0	none	N/A
D	2/15/12	Drain #2 South	pH	8.34	s.u.	6.0-9.0	N/A	6.5-8.5	N/A
2012/2013 WET SEASON									
W	2/28/14	South Drain	Zinc	0.33	mg/L	0.11	3	0.12	2.8
W	2/28/14	South Drain	Iron	6.2	mg/L	1	6.2	none	N/A
W	2/28/14	South Drain	Aluminum	2.8	mg/L	0.75	3.733333333	none	N/A
W	2/28/14	South Drain	Copper	0.14	mg/L	0.0123	11.38211382	none	N/A
W	4/1/14	South Drain	Zinc	0.49	mg/L	0.11	4.454545455	0.12	4.1
W	4/1/14	South Drain	Iron	3.3	mg/L	1	3.3	none	N/A
W	4/1/14	South Drain	Aluminum	1.9	mg/L	0.75	2.533333333	none	N/A
W	4/1/14	South Drain	Copper	0.13	mg/L	0.0123	10.56910569	none	N/A

Exhibit C

1/21/12	Saturday	0.4
1/23/12	Monday	0.23
2/15/12	Wednesday	0.12
2/27/12	Monday	0.28
3/17/12	Saturday	0.79
3/18/12	Sunday	0.24
3/25/12	Sunday	0.23
3/26/12	Monday	0.16
4/11/12	Wednesday	0.2
4/13/12	Friday	0.51
4/26/12	Thursday	0.55
10/11/12	Thursday	0.28
11/8/12	Thursday	0.39
11/30/12	Friday	0.31
12/12/12	Wednesday	0.12
12/13/12	Thursday	1.49
12/18/12	Tuesday	0.2
12/24/12	Monday	0.31
12/26/12	Wednesday	0.24
12/29/12	Saturday	0.28
1/6/13	Sunday	0.11
1/25/13	Friday	0.55
1/27/13	Sunday	0.24
2/8/13	Friday	0.55
2/19/13	Tuesday	0.31
2/20/13	Wednesday	0.36
3/8/13	Friday	0.59
10/9/13	Wednesday	0.47
11/21/13	Thursday	3.35
12/19/13	Thursday	0.16
2/27/14	Thursday	0.2
2/28/14	Friday	1.89
3/1/14	Saturday	0.43
4/2/14	Wednesday	0.27
4/25/14	Friday	0.36
4/26/14	Saturday	0.39